

PUBLIC SUBMISSION

As of: October 13, 2010

Received: October 12, 2010

Status: Posted

Posted: October 13, 2010

Tracking No. 80b6cf23

Comments Due: November 08, 2010

Submission Type: Web

Docket: EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0049

Comment submitted by Brandon Sheppard, Weed Man of Winchester

Submitter Information

Submitter's Representative: Brandon Sheppard

Organization: Weed Man

General Comment

To Whom It May Concern:

As lawn care professionals, we are deeply concerned by the proposed regulation in its present form; procedurally and substantively. The proposed TMDL's do not consider the overall environmental contribution of turfgrass and are rely heavily on research that does not consider the nutrient absorption potential of turfgrass and the impact that reductions in fertilization will have on the ability of turfgrass to function as an environmental filter. I suggest that you examine the research conducted recently at the University of Florida (<http://edis.ifas.ufl.edu/ss496>) for more information on how poorly constructed fertilization regulations can directly harm water quality.

It is well established that turgrass is a critical component to our increasingly urban environment. Turfgrass along with producing oxygen and processing carbon dioxide (as much as seven times the amount produced in its care), turfgrass absorbs tons of air and

waterborne pollutants.

Regulations on fertilization that are not based upon sound agronomic research will have a direct impact on the performance of turfgrass as well as injuring our air and water quality.

In regards to the procedural manner in which the proposed TMDL are being presented to the states, namely Virginia, we are concerned that the Virginia's effort to meet, and in some instances surpass the proposed TMDL limits are not being given adequate recognition. Additionally, the costs of implementation the proposed TMDL standards, beyond the levels proposed by Virginia, are prohibitively expensive for many rural communities and agricultural operations.

We wholeheartedly endorse functional, viable approaches to improve our water and air quality; however we cannot support the proposed TMDL format as currently presented.

Thank You,

Brandon Sheppard
Weed Man of Winchester
brandon.sheppard@weedmanusa.com